

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA : :

-v.-

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 1/09/2020
DATE FILED: 1/09/2020

:

JEFFERSON MORRILL, : :

Defendant. : :

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**UNOPPOSED MOTION OF DEFENDANT JEFFERSON MORRILL
TO MODIFY STANDARD CONDITION OF PROBATION SUPERVISION**

COMES NOW the Defendant, **Jefferson Morrill**, by and through his undersigned counsel, and hereby respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer” to permit Mr. Morrill to travel to the *Sports Licensing & Tailgate Show* in Las Vegas, Nevada, between the dates of January 14 through 18, 2020. (Docket Entry 28 at p. 4). In support hereof, Defendant states as follows:

1. On November 12, 2019, this Court sentenced Mr. Morrill to a one-year term of probation as a result of his conviction for trafficking in counterfeit goods, in violation of 18 U.S.C. § 2320. (Docket Entry 28, *Judgment In A Criminal Case*). The judgment contains *Standard Conditions of Supervision*. *Id.* at p.4. Standard Condition No. 3 precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer.” *Id.*

2. Since Mr. Morrill resides in the Middle District of Tennessee, Mr. Morrill's probation supervision was administratively transferred to the U.S. Probation Office for the Middle District of Tennessee. Mr. Morrill is being supervised by MDTN U.S. Probation Officer Montranese Vinson.

3. As disclosed in Mr. Morrill's Presentence Report, Mr. Morrill owns and operates Rochester Sports, an autographed sports memorabilia company, which sells legitimate, legal, signed sports merchandise. Mr. Morrill needs to attend a sports licensing show in Las Vegas between the dates of January 14 and January 18, 2020. Appended hereto as *Attachment 1* is an excerpt of a brochure which promotes the *Sports Licensing & Tailgate Show* which will be taking place at the Mandalay Bay Convention Center in Las Vegas between January 16 and 18, 2020. (Mr. Morrill needs to travel to Las Vegas on 1/15/2020.) This is the biggest sports memorabilia show in the United States and Mr. Morrill needs to attend in person to meet with vendors and companies to purchase legitimate items upon which real autograph signatures can be affixed and resold.

4. Undersigned counsel has met personally with MDTN Probation Officer Vinson who has authorized counsel to report that Mr. Morrill has been compliant with his probation supervision in all respects and Ms. Vinson is not opposed to this travel request as long as the Court approves the travel consistent with Standard Condition No. 3.

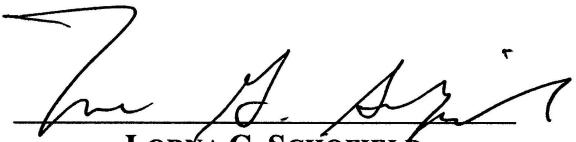
5. Assistant United States Attorney Daniel Nessim has authorized undersigned counsel to report that the government does not oppose this motion.

WHEREFORE, based on the foregoing, Defendant Morrill respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from "leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of

Tennessee] without first getting permission from the court or the probation officer" to permit Mr. Morrill to travel to the *Sports Licensing & Tailgate Show* in Las Vegas, Nevada, between the dates of January 14 through 18, 2020.

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 33.

Dated: January 9, 2020
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

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S/ Joseph W. Fuson
JOSEPH W. FUSON

Attorneys for Defendant Morrill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system, if registered, or, if unregistered in the Court's system, it has been sent via facsimile and deposited in the United States Mail, postage prepaid, to:

Daniel G. Nessim
Assistant United States Attorney
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, NY 10007

VIA EMAIL

Montranese Vinson
U.S. Probation Officer
Middle District of Tennessee
montranese_vinson@tnmp.uscourts.gov

This 7th day of January, 2020.

/s/ Peter J. Strianse
PETER J. STRIANSE

SPORTS LICENSING &

PREVIEW 2020

KEYNOTE & BREAKFAST

Free Hot Breakfast For All Attendees

SLTS 2020 EXHIBITOR PREVIEW

LICENSE TO BUY

Earn Money Back on Orders You Write

GAME CHANGERS FOR THE SPORTS LICENSING BUSINESS

NPD's Dirk Sorenson

to Deliver Keynote Address

NEW HOME FOR 2020

**SPOF
LICENS**

**ANI
TAILG
SHC**



PAID
U.S. POSTAGE
FIRST CLASS MAIL
PERMIT #336
ANAHEIM, CA

2080 / 2 / 44 / 107
*****SCH 3-DIGIT 370
NATE GRAHAM
ROCHESTER SPORTS
103 PADDOCK PLACE DR
MOUNT JULIET TN 37122-6606

JANUARY 16-18, 2020
MANDALAY BAY CONVENTION CENTER
LAS VEGAS, NV

FEATURES

INDUSTRY BREAKFAST & KEYNOTE:
NPD'S DIRK SORENSON

SHOW OVERVIEW

4

SCHEDULE OF EVENTS

6

SHOW FEATURES

8

INDUSTRY BREAKFAST & KEYNOTE

10

COVER STORY: GAME CHANGERS FOR THE SPORTS LICENSING BUSINESS

12

EDUCATIONAL SESSIONS

14

ICLA WINTER SYMPOSIUM

16

LICENSE TO BUY REWARDS PROGRAM

18

NEW PRODUCT SHOWCASE

20

EXHIBITOR PROFILES

24

EXHIBITORS BY PRODUCT CATEGORY

35

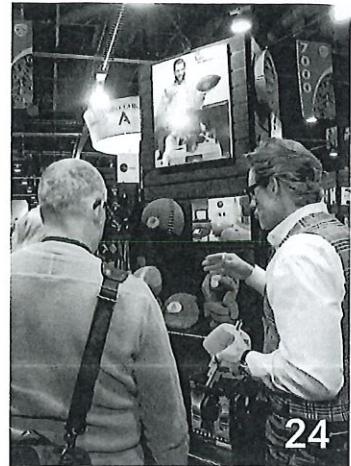
FLOOR PLAN

40



EDUCATIONAL SESSIONS

14



EXHIBITOR PROFILES

24

**SPORTS TAILGATE
LICENSING & SHOW**

THE SPORTS LICENSING AND TAILGATE SHOW TEAM**SALES OFFICE**

31910 Del Obispo, Suite 200
San Juan Capistrano, CA 92675
(949) 226-5700

Vice President & Show Director: Marisa Nicholson

OPERATIONS

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Operations Coordinator: Kathryn Markham
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MARKETING

Marketing Director: Nikki Puckett
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EXHIBIT SALES

Sales Director: Matt Lawson
(813) 531-7760 • Matt.Lawson@EmeraldExpo.com



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